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Counsel for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

*Jane Doe NLG (HK) v. Uber Technologies,
Inc., et al.*, No. 3:24-cv-8614-CRB

*Jane Doe NLG (R.M.) v. Uber
Technologies, Inc., et al.*, No. 3:24-cv-
09216-CRB

*Jane Doe NLG (KS) v. Uber Technologies,
Inc., et al.*, No. 3:25-cv-02616-CRB

*Jane Doe NLG (IM) v. Uber Technologies,
Inc., et al.*, No. 3:25-cv-02771-CRB

Et al

) Case No. 3:23-md-03084-CRB

) **ATTORNEY STEVEN S. SCHULTE’S**
) **DECLARATION REGARDING**
) **PLAINTIFFS NOT IN COMPLIANCE**
) **WITH COURT’S SEPTEMBER 16, 2025**
) **ORDER [ECF 3922]**

) Judge: Honorable Charles R. Breyer
) Date: October 3, 2025
) Time: 10:00 a.m.
) Courtroom: 6 – 17th Floor

DECLARATION OF STEVEN S. SCHULTE

I, Steven S. Schulte, declare as follows:

1. I am an attorney who is admitted *pro hac vice* to practice before this Court. I am a partner at the law firm Nachawati Law Group and counsel of record for Jane Doe NLG (HK), Jane Doe NLG (R.M.), Jane Doe NLG (KS), and Jane Doe NLG (IM) in MDL No. 3084. I make this declaration of my personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.
2. This declaration is made pursuant to the Court's Order to submit a Declaration within 28 days of the Order (October 14, 2025 being 28 days from September 16, 2025, the date the Order was signed) as to whether Counsel disagrees with any Plaintiff inclusion in Uber's Declaration, which Defendants submitted on October 6, 2025.
3. Counsel's firm has made significant effort to reach these Plaintiffs including numerous phone calls, emails, texts, written letters, and address searches.
4. Counsel submitted a response to the Opposition Motion on September 5, 2025, and explained we would continue to make efforts to reach any missing claimants.
5. Those efforts included extensive phone calls, text messages, emails, physical mailings to last known address, and address searches.
6. Through those continued efforts, Counsel received one responsive verification and authorization for a client listed on Defendants' Declaration.
7. In this regard, Counsel submitted a Plaintiff Verification of PFS and an Authorization to Disclose Law Enforcement Records for Jane Doe NLG (R.M.) on October 9, 2025.
8. Though late, the submission of their PFSs is still prior to the Court entering an Order for Dismissal.

1 9. Counsel would therefore dispute Jane Doe NLG (R.M.)’s inclusion on Uber’s current
2 list of delinquent Trip Receipts or Ride Information Forms for their Motion, as well as
3 ask for their exclusion on the Court’s future entry of Dismissal.
4

5 I declare under penalty of perjury under the laws of the United States of America that the
6 foregoing is true and correct.

7 Executed on October 14, 2025, in Dallas, Texas.

8 **NACHAWATI LAW GROUP**

9 /s/ Steven S. Schulte

10 Steven S. Schulte (TX SBN 24051306)

CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2025, I electronically transmitted the foregoing ATTORNEY STEVEN S. SCHULTE'S DECLARATION REGARDING PLAINTIFFS NOT IN COMPLIANCE WITH COURT'S SEPTEMBER 16, 2025 ORDER [ECF 3922] to the Clerk's office using the CM/ECF system for filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants.

NACHAWATI LAW GROUP

/s/ Steven S. Schulte
Steven S. Schulte (TX SBN 24051306)

PROOF OF SERVICE

I, the undersigned, declare: I am a citizen of the United States, over 18 years of age and not a party to the within action. My business mailing address is 5489 Blair Road, Dallas, TX 75231.

On the date specified below, I served a copy of the foregoing document described as:

ATTORNEY STEVEN S. SCHULTE'S DECLARATION REGARDING PLAINTIFFS NOT IN COMPLIANCE WITH COURT'S SEPTEMBER 16, 2025 ORDER [ECF 3922]

To be served by providing a true copy thereof addressed to each of the persons named below:

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6 **Attorneys for Defendants – UBER TECHNOLOGIES, INC., RASIER LLC, and RASIER-**
7 **CA, LLC**

8 **[X] BY ELECTRONIC TRANSMISSION ONLY:** By emailing the document(s) to the
9 persons at the email address(es) listed above. No electronic message or other indication
10 that the transmission was unsuccessful was received within a reasonable time after the
transmission.

11 I declare under penalty of perjury under the laws of the State of California that the above is true
12 and correct.

13 Executed October 14, 2025 in Dallas, Texas.

14 /s/ Porsha Sydnor

Porsha Sydnor

15 Paralegal